

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) **No. 1:19-CR-0696 (PAE)**
)
ARI TEMAN,)
)
Defendant.)

**DECLARATION OF EDEN P. QUANTON IN SUPPORT OF
MOTION FOR RECONSIDERATION**

I, Eden P. Quainton, declare under penalty of perjury that the following is true and correct:

1. I am counsel for Defendant Ari Teman (“Defendant” or “Teman”).
2. Set forth as Exhibit A hereto is a true and accurate copy of an email from Mr.

David Teman forwarding an email from Dr. Brusovanik stressing the risk to Mr. Teman from hospital transport in “martin chains.”

3. Set forth as Exhibit B hereto is a true and accurate copy of an email from me to Jacob Gutwillig dated April 23, 2024 alerting the Government to an alarming development relating to Mr. Teman involving a night fall and loss of consciousness with no night medical staff on duty for treatment.

4. Set forth as Exhibit C hereto is a true and copy of the response of Mr. Gutwillig, dated April 23, 2024 to my email set forth as Exhibit C.

5. Set forth as Exhibit D is a true and accurate copy of a letter from the parents of Mr. Teman to the Court, Damien Williams and Mr. Gutwillig, dated April 24, 2024, setting forth the circumstances of Mr. Teman’s fall and loss of consciousness.

6. Mr. Teman represented to me that Unit Manager Matthews had approved Mr. Teman's transfer to the satellite camp and that his case manager had prepared and submitted a Form 409 for the transfer, but that the transfer process could take weeks because of the need for numerous remaining signatures. At no time did Mr. Teman represent that he had received all necessary approvals for the transfer to the FCI satellite camp.

7. It has been exceptionally difficult to arrange an attorney-client call with Mr. Teman. One call repeatedly cut off in the middle of the conversation. It has taken more than a week to schedule a recent call, with numerous calls to FCI Miami going unanswered and calls from the facility being made without warning at times when counsel was unavailable.

Dated: April 29, 2024
New York, NY

Eden Quainton
EDEN P. QUAINTON